

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

LUIZ DASILVA,

Defendant

) Criminal No. 22cr10331  
)

) Violation:  
)

) Count One: Operation of Unlicensed Money  
) Transmitting Business  
) (18 U.S.C. § 1960(a))  
)

) Forfeiture Allegation:  
) (18 U.S.C. § 982(a)(1))  
)

INDICTMENT

COUNT ONE

Operation of an Unlicensed Money Transmitting Business  
(18 U.S.C. § 1960(a))

The Grand Jury charges:

From in or about October 2018 through in or about October 2020 in the District of Massachusetts, and elsewhere, the defendant,

LUIZ DASILVA,

did knowingly conduct, control, manage, supervise, direct, and own all and part of an unlicensed money transmitting business, as that term is defined in Title 18, United States Code, Section 1960(b)(1), through the operation of a business, that is, Mix Cell Phones, LLC, in that the business affected interstate and foreign commerce, in any manner and degree, and failed to comply with the money transmitting business registration requirements under Title 31, United States Code, Section 5330, and regulations prescribed therein.

All in violation of Title 18, United States Code, Section 1960(a).

MONEY LAUNDERING FORFEITURE ALLEGATION  
(18 U.S.C. § 982(a)(1))

The Grand Jury further finds:

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 1960(a), set forth in Count One, the defendant,

LUIZ DASILVA,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in such offenses, and any property traceable to such property.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 982(a)(1), as a result of any act or omission of the defendant --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 982(a)(1).

A TRUE BILL

  
FOREPERSON

  
JOHN T. MULCAHY  
ASSISTANT UNITED STATES ATTORNEY  
DISTRICT OF MASSACHUSETTS

District of Massachusetts: DECEMBER 7, 2022  
Returned into the District Court by the Grand Jurors and filed.

  
DEPUTY CLERK